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16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN JOSE DIVISION**

19 TEVA PHARMACEUTICALS USA, INC.,

20 Case No. 5:24-cv-03567-BLF

21 Plaintiff,

22 Honorable Beth Labson Freeman

23 vs.

24 CORCEPT THERAPEUTICS, INC., et al.,

25 **DECLARATION OF ROBERT W. STONE**  
26 **IN SUPPORT OF DEFENDANTS' REPLY**  
27 **IN SUPPORT OF JOINT MOTION TO**  
28 **STAY DISCOVERY PENDING**  
29 **RESOLUTION OF THEIR**  
30 **FORTHCOMING JOINT MOTION TO**  
31 **DISMISS**

32 Defendants.

33 Hearing Date: January 2, 2025 at 9:00 a.m.

1 I, Robert W. Stone, declare:

2 1. I am an attorney licensed to practice in the State of California and a member of the  
 3 Bar of this Court. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP, and serve as counsel  
 4 for Defendant Corcept Therapeutics, Inc. in this action. I have been actively involved in this action, I  
 5 am familiar with the proceedings, and have personal knowledge of the matters stated herein. I  
 6 respectfully submit this declaration in support of Defendants' Reply In Support of Joint Renewed  
 7 Motion to Stay Discovery Pending Resolution of Their Forthcoming Renewed Joint Motion to  
 8 Dismiss. If called as a witness, I could and would testify competently thereto.

9 2. On October 3, 2024, Teva served its First Set of Requests for Production of Documents  
 10 to Corcept and First Set of Requests for Production of Documents to Optime (collectively, "First Set  
 11 of RFPs").

12 3. Attached hereto as **Exhibit A** is a true and correct copy of Teva's First Set of Requests  
 13 for Production of Documents to Corcept.

14 4. Attached hereto as **Exhibit B** is a true and correct copy of Teva's First Set of Requests  
 15 for Production of Documents to Optime.

16 5. Teva's First Set of RFPs is highly expansive and burdensome. It includes 139 different  
 17 requests for documents and data to Corcept and 92 requests for documents and data to Optime. Many  
 18 of Teva's requests seek "All Documents and Communications" relating to a particular topic. Teva's  
 19 First Set of RFPs likewise define the "Relevant Time Period" as February 1, 2012 to the present date.

20  
 21 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
 22 and correct.

23 Executed on this 4th day of October 2024 in Redwood Shores, California.

24

25 By /s/ Robert W. Stone

26

27 Robert W. Stone

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